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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION  
SAN FRANCISCO COUNTY

Tactacell, LLC,  
Plaintiff,  
v.  
Deer Management Systems, LLC and  
Tactacam, LLC,  
Defendants.

Case No. 3:24-mc-80121-VC  
[PROPOSED] ORDER AWARDING  
REASONABLE COSTS AND FEES

1 This Court, having considered non-party Bertram Capital Management, LLC's  
2 ("Bertram") Supplemental Memorandum for Costs and Fees Pursuant and supporting papers, the  
3 motion papers submitted in connection with this miscellaneous action, any opposition papers, and  
4 finding that the rates and time spent to be reasonable, ORDERS the following:

- 5 1. The Court awards \$50,551 as Rule 45 sanctions jointly payable by Tactacell LLC and its  
6 counsel of record;
- 7 2. The sanction must be paid within fourteen days of this Order, and a notice filed indicating  
8 that payment is complete; and
- 9 3. The Court retains jurisdiction to enforce the discovery sanction imposed.

10 IT IS SO ORDERED.

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12 Dated: \_\_\_\_\_, 2024

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15 Hon. Vince Chhabria  
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